

FILED
2/21/2020

MC

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Western DIVISION

RECEIVED

FEB 10 2020 AC

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

WILLIE GLOVER

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

City of Chicago Police De-

partment

1st Arresting officer

2nd Arresting officer

1:20-cv-00959

Judge John Z. Lee

Magistrate Gabriel A. Fuentes

PC 3

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

- A. Name: WILLIE GLOVER
- B. List all aliases: _____
- C. Prisoner identification number: B53595
- D. Place of present confinement: Robinson C.C.
- E. Address: 13423 E. 1150th Ave Robinson IL 62454

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: 1st Arresting officer
Title: Chicago Police officer
Place of Employment: Homan Square Police Department
-
- B. Defendant: 2nd Arresting officer
Title: Chicago Police officer
Place of Employment: Homan Square Police Department
- C. Defendant: City of Chicago
Title: Chicago Police Department
Place of Employment: _____

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: none
- B. Approximate date of filing lawsuit: _____
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: none
- D. List all defendants: none
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): none
- F. Name of judge to whom case was assigned: none
- G. Basic claim made: none
-
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): none
- I. Approximate date of disposition: none

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

MR. WILLIE GLOVER, states within a non-corporate entity to the United States of America, Violations of Petitioner's Constitutional Rights evinced via members of the Chicago Police Department, particularly (Homan Square) Homan & Filmore Police Department. Corrupt Entities working within the full capacity as law enforcement officers as Squad C3 fraudulently detain MR Glover on or about the 9th day of December 2018. Mr Glover, while conversing with associates located on the west-side of Chicago 3859 W Augusta Blvd was approached by an undercover officer, detective of whom exited an unmarked truck with his partner & began search^{ING} Mr Glover, & the other two associates of Mr Glover. The detective that grabbed MR Glover, immediately whisper to Glover, not to speak & began to search Mr Glover then escorted Mr Glover, to the back sit of the unmark truck. Glover, began

to question the officer intentions for placing Glover under arrest. The Detective upon searching Glover removed \$ 673 dollars from Glover's person & began to count the U.S Currency, at this point Glover notice that the officer was moving Hastely while removing money taking from Glover and placing it in his right ^{Front} pocket. Glover, then asked the office why was he taking his money, the officer retorted that he was removing monies that was used to purchase heroin from Mr Glover, however, Glover, had seen the officer removed two 50 dollar bill's that was in his possession for atleast two (2) weeks, so it was impossible that those bill's were the mark money in which the officer removed. When Glover, conveyed this the officer told Glover, to "sit back and shut the Fuck up before he make Glover situation worser!" Glover, continue to complain & true to his word the office Fraudulently Charge Glover, after refusing to becoming A C.I. It Should be noted that the officer of whom was driving the truck was not in the truck as the passenger

officer was Stealing Glover's money. It Should
 also be noted that the alledge Delivery was not
 recorded, & or was there any body Cam's Available
 in order to Substantiate the charge of Delivery & or
 possession of Crack Cocaine. In Fact these
 Charges was ~~was~~ conjured after Mr Glover, Refused
 to work for the officer's, The officer's while in
 lock up explain to Mr Glover, the amount's of
 money he could obtain ^{For telling} depending upon the nature
 of the case, & as Far as the fraudulent Charges
 they both stated that do to having to come to the
 station they could not just release Glover, that
 Glover would go ^{through} ~~the~~ the process yet due to cor-
 poration per their request the judge will
 dismiss all Charges because the judge worked
 for them." MR Glover, refused; upon doing so
 The Arresting officer illegally Subjugated
 Petitioner Willie Glover to involuntary servi-
 tude, planted illegal narcotic & created a
 fraudulent police report. See Case/docket #
 19CR0184207. Further review will prove that these
 officers Fabricated Charges, For report's states that

During a search in the Station cocaine was discovered. However, this alleged possession was not even charged to Glover's arrest. J. Christopher Nolan, Public Defender, informed Glover, that the two bags of Heroin that Glover allegedly sold to undercover officers was not in inventory to be tested. However cocaine that the officer's allegedly discovered while in lock up tested positive for cocaine yet Mr Glover was not charged. Mr. Glover, ASK Christopher Nolan Did he bring all these inconsistencies to the state Attorney's and MR Nolan. Stated that he had & that the States Attorney held his head down & Stated And quote From MR Nolan "They, the officer's Fucked up again." Eventually all Charges of the 9th Day of December 2018 was dropped. Mr Willie Glover, Shall prove as evident within another arrest that these officer's From the police department of Homan Square actions are retaliatory in an attempt to discredit Mr Glover's decry of injustice since 2005. ~~Willie~~ Willie Glover V. United States #1151263. After 2018 of June 4th ~~the~~ the officers discovering that The Exoneration Project was no longer representing Mr Glover, These officers From Filmore & Homan Square not once but twice arrested Willie Glover & within second arrest used the Chicago New's paper reporter to discredit Glover. Mr Glover will make clear within another 1983 complaint of Perpetual Pattern of Corruption

Glouer, Attempted through FOIA Act to obtain
Arresting officer's name & badge # even Appealed
to the Attorney General office & yet again denied.
documents of such attempt are attached within.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Within each ~~XXXX~~ Defendant's & corporation of the City of Chicago Police Department, Plaintiff Willie Glover seek relief of compensatory damages as well as punitive damages in the amount of 20 Million U.S currency of all incurred injuries

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

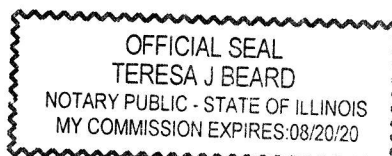
Signed this 11 day of JAN, 20 20
Willie Glover

(Signature of plaintiff or plaintiffs)

Willie Glover
(Print name)

B53595
(I.D. Number)

Robinson C.C.
13423 E. 1150th AVE Robinson IL
62454
(Address)



Teresa J Beard 1-21-2020
Notary Public
Revised 9/2007

Chicago Police Department - ARREST Report

CB #: 19740386

GLOVER, Willie

ARREST REPORTING

WARRANT

NO WARRANT IDENTIFIED

VICTIM AND COMPLAINANT

NON-OFFENDER(S)

Name: STATE OF ILLINOIS

1 - Redaction

Injured? No

Deceased? No

DOB:

Hospitalized? No

Age:

Treated and Released? No

Comments:

ARRESTEE
VEHICLE

NO ARRESTEE VEHICLE INFORMATION ENTERED

PROPERTIES

Confiscated Properties :

All confiscated properties are recorded in the e-Track System. This system can be queried by the inventory number to retrieve all official court documents related to evidence and/or recovered properties.

PROPERTIES INFORMATION FOR GLOVER, Willie, NOT AVAILABLE IN THE AUTOMATED ARREST SYSTEM.

INCIDENT NARRATIVE

(The facts for probable cause to arrest AND to substantiate the charges include, but are not limited to, the following)

EVENT# THIS IS AN ARREST BY SQUAD C3. IN SUMMARY: ABOVE WAS PLACED INTO CUSTODY, AFTER A POSITIVE IDENTIFICATION, IN THAT OFFENDER TENDERED TWO PINK TINTED ZIP LOCK BAGS EACH CONTAINING SUSPECT HEROIN 1 - Redaction A CUSTODIAL SEARCH REVEALED THREE YELLOW TINTED ZIP LOCK BAGS EACH CONTAINING SUSPECT CRACK COCAINE 1 - Redaction WITH OFFENDER'S USC. TRANSPORTED TO UNIT 189 FOR PROCESSING. USC WAS INVENTORIED AND RETURNED PER DEPT POLICY. NAME CHECK CLEAR. NO WARRANTS/INVESTIGATIVE ALERTS. NOT ON PAROLE/PROBATION. NO BWC. NO O.O.P. DENIES ANY GANG AFFILIATION. USC INV#14325746. HEROIN INV#14325754. CRACK/COCAINE INV#14325753.

SEE WC COMMENTS SECTION FOR ADDITIONAL COMMENTS

COURT INFO

Desired Court Date: 09 January 2019

Branch: 44-2 3150 W FLOURNOY ST - Room

Court Sgt Handle? No

Initial Court Date: 10 December 2018

Branch: CBC-1 2600 S CALIFORNIA - Room100

Docket #:

BOND INFO

Bond Date: 10 December 2018 13:45

Type: Recognizance

Receipt #: I7707733

Amount: \$25,000.00

CHICAGO POLICE DEPARTMENT

FINAL APPROVAL

CB #: 19740386

IR #: 986001

YD #:

RD #: JB545977

EVENT #: 1834304105

ARREST REPORT

3510 S. Michigan Avenue, Chicago, Illinois 60653

(For use by Chicago Police Department Personnel Only)

CPD-11. 420C(REV. 6/30)

ARREST REPORTING

OFFENDER	Name: GLOVER, Willie C Res: 311 N Aberdeen St, #3 Chicago, IL 60607 None DOB: 10 July 1974 AGE: 44 years POB: Illinois ARMED WITH Unarmed		Beat: 1214 Male Black 6' 02" 165 lbs Brown Eyes Black Hair Short Hair Style Light Brown Complexion	NO PICTURE AVAILABLE	
INCIDENT	Arrest Date: 09 December 2018 07:40 Location: 3859 W Augusta Blvd Chicago, IL 60651 304 - Street Holding Facility: District 011 Male Lockup Resisted Arrest? No		TRR Completed? No Beat: 1112	Total No Arrested: 1 Co-Arrests DCFS Ward ? No Dependent Children? No	Assoc Cases
	CHARGES	1 Offense As Cited 720 ILCS 570.0/401-D-I OTHER AMT NARCOTIC SCHED I&II Class 2 - Type F		Victim 1 - Redaction	
2 Offense As Cited 720 ILCS 570.0/402-C PCS - POSSESSION - POSS AMT CON SUB EXCEPT (A)(D) Class 4 - Type F					
3 Offense As Cited 720 ILCS 5.0/21-1-A-1 CRIM DAMAGE TO PROPERTY <\$300 Class A - Type M					
4 Offense As Cited 720 ILCS 5.0/21-1-A-1 CRIM DAMAGE TO PROPERTY <\$300 Class A - Type M					
RECOVERED NARCOTICS	Type Suspect Controlled Substance Suspect Controlled Substance		Approx. Weight/Quantity .4 .3	Units GRAMS GRAMS	Estimated Street Value \$60.00 \$36.90

IR #986001

CB #:19740386

Chicago Police Department - ARREST Report

CB #: 19740386

GLOVER, Willie

ARREST REPORTING

REPORTING PERSONNEL

ATTESTING OFFICER:

I hereby declare and affirm, under penalty of perjury, that the facts stated herein are accurate to the best of my knowledge, information and/or belief.

Attesting Officer:

1 - Redaction

09 DEC 2018 09:35

ARRESTING OFFICER(S):

1st Arresting Officer:

1 - Redaction

Beat

2nd Arresting Officer:

1 - Redaction

APPROVING SUPERVISOR:

Approval of Probable Cause : #1254

MC GEE JR, J T

1 - Redaction

09 DEC 2018 09:54

Redaction Date: Tuesday, September 3, 2019 10:27:10 AM

Total Number of Redactions: 12

By Exemption:

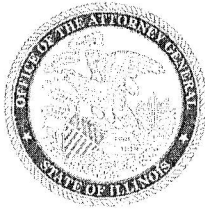
"Redaction" (Redaction): 12 instances

By Page:

Page 1 - "Redaction" (Redaction): 2 instances

Page 2 - "Redaction" (Redaction): 5 instances

Page 3 - "Redaction" (Redaction): 5 instances



OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

November 6, 2019

Mr. Willie Glover, B53595
Robinson Correctional Center
P.O. Box 1000
Robinson, Illinois 62454

RE: FOIA Requests for Review – 2019 PAC 60358

Dear Mr. Glover:

On October 28, 2019, this office received your Request for Review alleging that the Chicago Police Department (CPD) did not respond to your September 6, 2019, Freedom of Information Act (FOIA) request seeking certain arrest reports and information about arresting officers. Based upon the materials you submitted and pursuant to section 9.5(f) of FOIA (5 ILCS 140/9.5(f) (West 2018)), which permits the Attorney General to exercise his discretion to resolve a Request for Review "by a means other than the issuance of a binding opinion," we have determined that no further inquiry is warranted. Accordingly, this file is closed.

Enclosed are copies of the materials that you submitted to this office. We note a person whose FOIA request has been denied by a public body "may file suit for injunctive or declaratory relief" against that public body. 5 ILCS 140/11(a) (West 2018).

Very truly yours,

A handwritten signature in black ink, appearing to read "Leah", is written over a horizontal line.

LEAH BARTELT
Assistant Attorney General
Public Access Bureau

60358 f dsc pd

Enclosure



Lori E Lightfoot
Mayor

Department of Police · City of Chicago
3510 S. Michigan Avenue · Chicago, Illinois 60653

Eddie T. Johnson
Superintendent of Police

3 September 2019

Willie Glover
B53595
Robinson Correctional Center
13423 E. 1150th Ave
Robinson, IL 62454

RE: NOTICE OF RESPONSE TO FOIA REQUEST
FOIA FILE NO.: P517670

Dear Mr. Glover:

The Chicago Police Department (CPD) is in receipt of your Freedom of Information Act (FOIA) request. In it you request:

... Any and all records pertaining to arrest of Dec-9-2018 and arrest of Jan -22-2019 Include also search warrant....

Your request was reviewed by the undersigned. A search was conducted based on the parameters provided. Information responsive to your request is available and attached. At this time you are being provided copies of Arrest Reports CB# 19759335, CB# 19740386, and Search Warrant 19SW4456. Please be advised that certain information is redacted from the documents pursuant to the following sections of FOIA.

Section 7(1)(b) exempts from disclosure "[p]rivate information, unless disclosure is required by another provision of this Act, a State or federal law or a court order." 5 ILCS 140/7(1)(b). The FOIA, in 5 ILCS 140/2(c-5), defines "private information" as follows:

"Private information" means unique identifiers, including a person's social security number, driver's license number, employee identification number, biometric identifiers, personal financial information, passwords or other access codes, medical records, home or personal telephone numbers, and personal email addresses. Private information also includes home address and personal license plates, except as otherwise provided by law or when compiled without possibility of attribution to any person."

Therefore, home addresses, social security numbers, telephone numbers, and driver's license numbers were properly redacted pursuant to Section 7(1)(b). Likewise, Department employee user codes and employee identification numbers are exempt and were properly redacted pursuant to Section 7(1)(b).

In addition, dates of births, and the names of victims and those who provided information to the police were also redacted, as they are exempt from disclosure pursuant to 5 ILCS 140/7(1)(c) of FOIA. Section 7(1)(c) exempts from inspection and copying the following:

"[P]ersonal information contained within public records, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy... 'Unwarranted invasion of personal privacy' means the disclosure of information is that highly personal or objectionable to reasonable person and in which the subject's right to privacy outweighs any legitimate public interest in obtaining the information." *Id.*

Victims, witnesses, and suspects have a strong interest in keeping their identity private and therefore their names were properly redacted pursuant to Section 7(1)(c) of FOIA. Moreover, dates of birth are highly personal and were also properly redacted pursuant to Section 7(1)(c) of FOIA.

WILLIE Glover 853595
P.O. Box 7000
Robinson IL 62454

THIS CORRESPONDENCE IS FROM
AN INMATE IN THE ILLINOIS DEPT
OF CORRECTIONS



U.S. POSTAGE PTNEY BOWES
ZIP 62454 \$ 008.25⁰
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RECEIVED

FEB 10 2020

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES
DISTRICT COURT
219 S DEARBORN ST.
Chicago IL 60604



02/10/2020-16

PRIORITY
★ MAIL ★

TRACKED
★ ★ ★
INSURED
★



For Domestic Use Only

Label 107R, July 2013

1:20-cv-00959
Judge John Z. Lee
Magistrate Gabriel A. Fuentes
PC 3

